

# Exhibit 15

UNITED STATES DISTRICT  
SOUTHERN DISTRICT OF NEW YORK  
Case No. 18-Civ. 12355

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SHABTAI SCOTT SHATSKY, individually  
and as personal representative of the  
Estate of Keren Shatsky, J ANNE  
SHATSKY, individually and as personal  
representative of the Estate of Keren  
Shatsky, TZIPPORA SHATSKY SCHWARZ,  
YOSEPH SHATSKY, SARA SHATSKY TZIMMERMAN,  
MIRIAM SHATSKY, DAVID RAPHAEL SHATSKY,  
GINETTE LANDO THALER, individually and  
as personal representative of the  
Estate of Rachel Thaler, LEOR THALER,  
ZVI THALER, ISAAC THALER, HILLEL  
TRATTNER, RONIT TRATTNER, ARON S.  
TRATTNER, SHELLEY TRATTNER, EFRAT  
TRATTNER, HADASSA DINER, YAEL  
HILLMAN, STEVEN BRAUN, CHANA  
FRIEDMAN, ILAN FRIEDMAN, MIRIAM  
FRIEDMAN, YEHIEL FRIEDMAN, ZVI  
FRIEDMAN, and BELLA FRIEDMAN,

Plaintiffs,

- against -

THE PALESTINE LIBERATION ORGANIZATION  
and THE PALESTINE AUTHORITY(a/k/a "The  
Palestinian Interim Self-Government  
Authority" and/or "The Palestinian  
National Authority"),  
Defendants.

-----x

Videotaped Deposition of 30(b)(6)

Witness, FARID GHANNAM, (with all parties  
participating remotely), on Thursday,  
July 29, 2021, commencing at 7:33 a.m.,  
before Roberta Caiola, a Professional Court  
Reporter and a Notary Public.

## 1 A P P E A R A N C E S:

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mitchell.berger@squirepb.com  
joseph.alonzo@squirepb.com

26 Also Present:  
27 Mordechai Haller  
28 Simek Shropshire, Paralegal  
29 Cohen & Gresser  
30 Arabic-Hadeer Al Amiri, The Interpreter  
31 Corey Wainaina, The Videographer

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1 Farid Ghannam

2 THE VIDEOGRAPHER: Good

3 morning, everyone. We are now on the  
4 record. Participants should be aware  
5 that this proceeding is being  
6 recorded and, as such, all  
7 conversations held will be recorded,  
8 unless there is a request and  
9 agreement to go off the record.

10 This is the remote video  
11 recorded deposition of Farid Ghannam.

12 Today is Thursday, July 29, 2021.

13 The time is now 11:32 UTC time. We  
14 are here in the matter of Shatsky  
15 versus PLO.

16 My name is Corey Wainaina,  
17 remote video technician on behalf of  
18 U.S. Legal Support, located at 90  
19 Broad Street, New York, New York. I  
20 am not related to any party in this  
21 action, nor am I financially  
22 interested in the outcome. At this  
23 time, will the reporter, Roberta  
24 Caiola, on behalf of U.S. Legal  
25 Support, please enter the statement

1 Farid Ghannam  
2 for remote proceedings into the  
3 record.

4 THE COURT REPORTER: The  
5 attorneys participating in this  
6 deposition acknowledge that I am not  
7 physically present in the deposition  
8 room and that I will be reporting  
9 this deposition remotely.

10 They further acknowledge that,  
11 in lieu of an oath administered in  
12 person, I will administer the oath  
13 remotely, pursuant to executive order  
14 number 202.7 issued by Governor Cuomo  
15 on March 19, 2020.

22 MS. VINCZE: Eszter Vincze for  
23 Cohen & Gresser. We represent  
24 plaintiffs. We agree.

25 MR. BERGER: This is Mitchell

1 Farid Ghannam  
2 Berger, Squire Patton Boggs on behalf  
3 of defendants, and we agree.

4 ARABIC-HADEER AL AMIRI, called as the  
5 official interpreter, having been duly  
6 sworn (by Roberta Caiola) to translate  
7 questions from English to Arabic and  
8 answers from Arabic to English, translated  
9 as follows:

10 FARID GHANNAM, called as a witness, having  
11 been duly sworn (through the interpreter)  
12 by a Notary Public of the State of New  
13 York, testified as follows:

14 MS. VINCZE: Before we begin  
15 with Mr. Ghannam, just one  
16 housekeeping measure. Since we are  
17 here remotely during the COVID-19  
18 pandemic, we would ask that  
19 defendants confirm that, pursuant to  
20 Rule 30(b)(4) of the Federal Rules of  
21 Civil Procedure, that today's  
22 deposition may be taken by video  
23 conference as we're proceeding.

24 Pursuant to Rule 29, the  
25 parties also stipulate that

1 Farid Ghannam  
2 Ms. Caiola is an appropriate officer  
3 before whom this deposition may be  
4 taken, even though the witness is in  
5 Jordan and Ms. Caiola is located in  
6 New York. Do we agree?

7 MR. BERGER: This is Mitchell  
8 Berger on behalf of defendants. We  
9 agree.

10 MS. VINCZE: Thank you.

11 EXAMINATION

12 BY MS. VINCZE:

13 Q. Good morning, Mr. Ghannam.  
14 Thank you for coming here today. My name  
15 is Eszter Vincze. I'm here representing  
16 plaintiffs in this case and I will be  
17 asking you some questions today and  
18 tomorrow. Before I do so -- pardon?

19 (Pause in proceedings.)

20 -- I just want to go through  
21 some ground rules so that you know what to  
22 expect today.

23 Please state your name and  
24 address for the record.

25 A. My name is Farid Ahmed Abed

1 Farid Ghannam

2 Hafez Ghannam. I live in Palestine,

3 Ramallah.

4 Q. What is your occupation and  
5 title?

6 A. My occupation is the Deputy of  
7 the Minister of Finance, and my title is  
8 A1.

9 Q. Have you ever had your  
10 deposition taken before?

11 A. No.

12 Q. So I'm going to go over the  
13 process with you, so that we're all on the  
14 same page. Is that all right?

15 A. Yes.

16 Q. Do you understand that you are  
17 testifying under oath?

18 A. Yes.

19 Q. The court reporter will be  
20 transcribing everything we say today. To  
21 make sure that the record is accurate, and  
22 especially since this deposition is taking  
23 place via remotely, in light of the  
24 COVID-19 pandemic, it is important that we  
25 do not speak over each other, so that only

1 Farid Ghannam

2 one person speaks at a time.

3 Please wait until I finish my  
4 questions before you start answering them,  
5 and I will wait until you finish your  
6 answer before I ask another question. Is  
7 that understood?

8 A. Yes.

9 Q. It is also important for you to  
10 respond to questions verbally. For  
11 example, nodding your head can't be  
12 transcribed.

13 A. Yes.

14 Q. If you do not understand a  
15 question, please let me know. I will try  
16 to rephrase it for you. But, if you answer  
17 a question, I will assume that you  
18 understood my question. Okay?

19 A. Yes.

20 Q. Thank you. Now, your counsel  
21 may object to my questions, but unless your  
22 counsel instructs you not to answer a  
23 question, you should go ahead and answer my  
24 question, even though there was an  
25 objection. Is that understood?

1 Farid Ghannam

2 A. Yes.

3 Q. I may take periodic breaks  
4 during the deposition. If you need a  
5 break, please let me or your attorney know,  
6 and I will do my best to accommodate your  
7 request. However, if a question is  
8 pending, I ask that you answer the question  
9 first before we take a break. All right?

10 MR. BERGER: By counsel, before  
11 he answers that, and consistent with  
12 the local rules, he's going to say  
13 yes for that, save for the exception  
14 of any break we need to take to  
15 confer over potential questions of  
16 privilege before he answers. You may  
17 answer.

18 Q. Do you remember the question,  
19 Mr. Ghannam?

20 A. Yes.

21 Q. And, did you understand what I  
22 had to say about breaks?

23 A. Yes.

24 Q. We're going to show you a lot  
25 of documents today. If at any time you

Farid Ghannam

need to see more of the document than is on the screen, then please let me know and we will try to accommodate that. Okay?

A. Yes.

Q. Mr. Ghannam, do you speak English?

A. I don't master English speaking.

Q. Do you speak some degree of English?

A. I cannot speak or express myself in the English language.

Q. Do you understand English?

A. I don't speak the English language well.

Q. Is there any reason you can't testify truthfully today?

A There is no reasons

Q. Is there any reason you can think of as to why you would not be able to answer my questions today fully and accurately?

A. There is no reasons.

Q. Now, when I ask you questions,

1 Farid Ghannam  
2 I will be using shorthand for some terms.  
3 For example, when I refer at times to  
4 "defendants," I mean both the Palestinian  
5 Authority and the Palestine Liberation  
6 Organization. Do you understand?

7 A. Yes.

8 Q. And I will be referring to the  
9 Palestinian Authority as the PA sometimes.  
10 Do you understand that?

11 A. Yes.

12 Q. And I will be referring to the  
13 Palestinian Liberation Organization as the  
14 PLO sometimes. Do you understand that?

15 A. Yes.

16 Q. Thank you. Let's briefly  
17 review your educational background. What  
18 is your highest level of education?

19 A. The highest level of education  
20 that I obtained is a master's degree in  
21 financial science and banking, and now I'm  
22 studying the Ph.D.

23 Q. And where did you receive that  
24 master's degree?

25 A. In the Islamic University in

1 Farid Ghannam

2 Gaza.

3 Q. Where are you studying for your  
4 Ph.D.?

5 A. Can you repeat the question?

6 THE INTERPRETER: This is the  
7 interpreter. I will repeat the  
8 question.

9 Q. Where are you studying for your  
10 Ph.D.?

11 A. I registered in Morocco, in  
12 Mohamed Al Khamis Universiti.

13 Q. Do you have any licenses, any  
14 professional licenses?

15 A. Yes.

16 Q. What are those licenses?

17 A. A license in the financial  
18 sciences and banking. Also, a license to  
19 teach in the science, financial science in  
20 the university.

21 Q. And do you teach at the  
22 financial -- at the university?

23 A. I taught in Birzeit University  
24 for four years, the financial science and  
25 banking.

1 Farid Ghannam  
2 MR. BALOUL: This is an  
3 objection to the translation. It's  
4 not banking. It's accounting.  
5 THE INTERPRETER: Accounting.  
6 Q. What courses did you teach?  
7 A. It's general financing.  
8 Q. Do you have a bachelor's  
9 degree?  
10 A. Yes.  
11 Q. Where is your bachelor's degree  
12 from?  
13 A. From Alexandria University from  
14 Egypt.  
15 Q. And when did you obtain that  
16 bachelor's degree?  
17 A. 1983.  
18 Q. And when did you begin your  
19 master's program?  
20 A. I started studying for the  
21 master's degree in 2002.  
22 Q. And when did you obtain your  
23 master's degree?  
24 A. In 2006.  
25 Q. Do you have any professional

1 Farid Ghannam

2 certifications?

3 A. Other than the certificate  
4 concerning the financial sciences and  
5 accounting, I don't have any other  
6 certificates.

7 Q. You have been designated to  
8 testify on behalf of both the PA and the  
9 PLO, correct?

10 A. Yes.

11 Q. Do you have a formal position  
12 within the PA?

13 A. Deputy of the Finance, Minister  
14 of Finance.

15 Q. Do you hold any other titles  
16 within the PA?

17 A. I'm a member in multiple  
18 organizations in the Palestinian Authority.

19 Q. What are those organizations?

20 THE INTERPRETER: This is the  
21 interpreter. I'm going to ask the  
22 respondent to say them one by one.

23 A. The Alliance for Industrial  
24 Cities.

25 (Court reporter clarification.)

1 Farid Ghannam

2 THE INTERPRETER: The Affairs

3 of Industrial Cities.

4 A. The Affairs of the Water

5 Authority. The Employment Palestinian

6 Authority.

7 Q. Is that -- are there any other  
8 organizations of which you are a member  
9 within the PA?

10 THE INTERPRETER: So this is

11 interpreter.

12 (Clarifying.)

13 A. The Finance Palestinian

14 Authority.

15 Q. Are there any other  
16 organizations, besides the ones that you  
17 have listed within the PA, of which you are  
18 a member?

19 A. No.

20 Q. What do you do for the Alliance  
21 for the Affairs of Industrial Cities?

22 A. I work as a member of the  
23 regulatory committee in this institute.

24 Q. And what do you do for the  
25 Affairs of the Water Authority?

1 Farid Ghannam

2 A. The same function. A member in  
3 the...

4 Q. A member in the what?

5 A. The same function. A member in  
6 the organization's affair.

7 MS. VINCZE: This is a question  
8 for the interpreter. Did he -- did  
9 he say -- can you repeat what he said  
10 to me again, please?

11 THE INTERPRETER: Yes, ma'am.

12 It's the same function. It's a  
13 member in the organization affairs.

14 Q. What do you do in the  
15 employment PA?

16 A. I work as a member in the  
17 organization's committee.

18 Q. And what do you do for the  
19 finance PA?

20 A. I'm a member in the  
21 organization's committee.

22 Q. What is the Alliance of the  
23 Affairs of Industrial Cities?

24 A. I work in the industrial cities  
25 as a member.

1 Farid Ghannam

2 Mr. Ghannam?

3 A. Yes, I do.

4 MS. VINCZE: This is Exhibit

5 Number 1. For the record, this is

6 the 30(b)(6) Notice dated June 16,

7 2021.

8 MR. BERGER: Do you have an

9 Arabic translation?

10 MS. VINCZE: No.

11 Q. Do you recognize this document,

12 Mr. Ghannam?

13 A. Yes.

14 Q. What is it?

15 A. This document was presented to

16 me, translated into Arabic by the

17 attorneys, concerning some synonyms, and I

18 read it.

19 Q. When did you first see it?

20 A. I saw this document about a  
21 month ago.

22 Q. And do I understand it  
23 correctly that you were shown this document  
24 by your attorneys?

25 A. Yes.

1 Farid Ghannam

2 Q. Are you appearing today  
3 pursuant to this notice?

4 A. Yes.

5 Q. Are you aware that you are here  
6 to testify on behalf of the PA?

7 A. Yes.

8 Q. Who designated you to testify  
9 on behalf of the PA?

10 A. The Minister of Finance.

11 Q. Are you aware that you are also  
12 here to testify on behalf of the PLO?

13 A. Yes.

14 Q. Who designated you to testify  
15 on behalf of the PLO?

16 A. The Minister of Finance.

17 Q. Have you read the deposition  
18 topics on pages 2 through 3?

19 A. Yes.

20 Q. Topic 1 asks for testimony  
21 regarding any payments made by defendants,  
22 directly or indirectly, after April 18,  
23 2020 to any individual -- pardon me --  
24 payments made by defendants directly --  
25 withdraw the question.

1 Farid Ghannam  
2 martyrs, whether it's inside or outside,  
3 goes through the Minister of Finance.

4 MR. BALOUL: Objection to --  
5 this is Gassan Baloul. Objection to  
6 the translation. He did not say  
7 detainees. He said all payments,  
8 period. No detainees.

9 THE INTERPRETER: This is the  
10 interpreter. He said both.

11 (Cross-talk in Arabic.)

12 MR. BERGER: Why don't we have  
13 him repeat the answer, and maybe this  
14 time he'll give us a little bit more.

15 MS. VINCZE: Mr. Berger, I'm  
16 going to repeat the question, and  
17 then we will have the answer. All  
18 right?

19 Q. Now, how do you have direct  
20 knowledge of this topic?

21 A. All the payments that is made  
22 to the families of the wounded and martyrs,  
23 whether inside or outside, goes through the  
24 Ministry of Finance.

25 MS. VINCZE: A quick question

1 Farid Ghannam

2 kinds of support?

3 MR. BERGER: Objection,

4 ambiguous. You may answer if you  
5 understand the question.

6 A. This establishment works  
7 according to the law that governs the  
8 health -- taking care of the family --  
9 martyrs' families and wounded, and whatever  
10 the laws say, the establishment works  
11 according to that law.

12 Q. Does that include the 2016 law  
13 that you mentioned previously?

14 A. Yes.

15 Q. How is the work of the Martyrs'  
16 Family and Injured Care Establishment  
17 funded?

18 A. From the general budget.

19 Q. And what is the source of the  
20 funds allocated to it from the general  
21 budget?

22 A. The general income that comes  
23 from the taxes collected, directly and  
24 indirectly, from the Palestinian  
25 population.

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

- - -  
SHABTAI SCOTT SHATSKY, ) Case No. 18-Civ. 12355  
individually and as )  
personal representative )  
of the Estate of Keren ) VIRTUAL VIDEOTAPED  
Shatsky, J ANNE ) DEPOSITION OF FARID  
SHATSKY, individually ) GHANNAM, VOLUME II  
and as personal ) JULY 30, 2021  
representative of the )  
Estate of Keren )  
Shatsky, TZIPPORA )  
SHATSKY SCHWARZ, YOSEPH )  
SHATSKY, SARA SHATSKY )  
TZIMMERMAN, MIRIAM )  
SHATSKY, DAVID RAPHAEL )  
SHATSKY, GINETTE LANDO )  
THALER, individually )  
and as personal )  
representative of the )  
Estate of Rachel )  
Thaler, LEOR THALER, )  
ZVI THALER, ISAAC )  
THALER, HILLEL  
TRATTNER, RONIT  
TRATTNER, ARON S.  
TRATTNER, SHELLEY  
TRATTNER, EFRAT  
TRATTNER, HADASSA  
DINER, YAEL HILLMAN,  
STEVEN BRAUN, CHANA  
FRIEDMAN, ILAN  
FRIEDMAN, MIRIAM  
FRIEDMAN, YEHIEL  
FRIEDMAN, ZVI FRIEDMAN,  
and BELLA FRIEDMAN,

Plaintiffs,

against

1  
2 THE PALESTINE  
3 LIBERATION ORGANIZATION  
4 and THE PALESTINIAN  
5 AUTHORITY (a/k/a "The  
6 Palestinian Interim  
Self-Government  
Authority" and/or "The  
Palestinian National  
Authority") ,

7 Defendants.  
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1 VIRTUAL VIDEOTAPED DEPOSITION OF FARID  
2 GHANNAM, VOLUME II, witness herein, called by  
3 the Plaintiffs, for examination, taken pursuant  
4 to the Federal Rules of Civil Procedure, by and  
5 before Kathy D. Landock, a Certified Realtime  
6 Reporter and a notary public in and for the  
7 Commonwealth of Pennsylvania, held remotely  
8 with all parties appearing from their  
9 respective locations, on Friday, July 30, 2021,  
10 at 1133 UTC time.

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## 1 COUNSEL PRESENT:

## 2 For the Plaintiffs:

3                   Melissa Maxman, Esq.  
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11                  Mitchell R. Berger, Esq.  
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17                  Washington, DC 20037

## 18 ALSO PRESENT:

19                  Corey Wainaina, Videographer  
20                  Hadeer Al-Amiri, Interpreter  
21                  Simek Shropshire  
22                  Mordechai Haller

23                  - - -

## I N D E X

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16	Exhibit 13	The law that governs the caring of families of the wounded and martyrs	160

1 Q. Can you please page down to JD 87.

2 Mr. Ghannam, is it fair to say this  
3 shows that Fatma Hamed Isma'il Masri has been  
4 receiving payments on a monthly basis from  
5 April 2020 through April 2021?

6 A. Yes.

7 Q. And she receives these payments as  
8 the beneficiary of Izz al-Din Shuheil Ahmad  
9 al-Masri; correct?

10 A. Yes.

11 Q. These payments are made from funds  
12 under the control of the PA; correct?

13 A. Yes.

14 Q. Because all payments made to  
15 qualifying beneficiaries of people designated  
16 as martyrs are made from funds under the  
17 control of the PA; correct?

18 MR. BERGER: Objection,  
19 indefinite as to time.

20 BY MS. VINCZE:

21 Q. You may answer, Mr. Ghannam.

22 A. Yes.

23 Q. Thank you.

24 To your understanding, does Fatma  
25 Hamed Isma'il Masri continue to receive these